

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAURA PREFONTAINE, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

RESEARCH IN MOTION LIMITED, BRIAN
BIDULKA, JAMES L. BALSILLIE and
MIHALIS "MICHAEL" LAZARIDIS,

Defendants.

Civil Action No. 1:11-cv-04068-RJS

NANCY A. DEMARKIS, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

RESEARCH IN MOTION LIMITED, BRIAN
BIDULKA, JAMES L. BALSILLIE and
MIHALIS "MICHAEL" LAZARIDIS,

Defendants.

Civil Action No. 1:11-cv-04560-RJS

MICHAEL MCNEAL AND KENNETH
GOLD, Individually And On Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

RESEARCH IN MOTION LIMITED, BRIAN
BIDULKA, JAMES L. BALSILLIE and
MIHALIS "MICHAEL" LAZARIDIS,

Defendants.

Civil Action No. 1:11-cv-05472-RJS

**DECLARATION OF DAVID A.P. BROWER IN SUPPORT OF THE MOTION
OF ROBERT SHEMIAN TO CONSOLIDATE RELATED ACTIONS; TO BE
APPOINTED LEAD PLAINTIFF; AND TO APPROVE PROPOSED LEAD
PLAINTIFF'S CHOICE OF COUNSEL**

I, David A.P. Brower, hereby declare as follows:

1. I am over 18 years of age and am competent to testify to the matters and facts hereinafter set forth. I am a principal of the law firm of Brower Piven, A Professional Corporation.

2. I am counsel for Lead Plaintiff movant, Robert Shemian. I submit this Declaration in support of the Motion Of Robert Shemian To Consolidate Related Actions; To Be Appointed Lead Plaintiff; And To Approve Proposed Lead Plaintiff's Choice Of Counsel filed pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. §78u-4(a)(3)(B), as amended by Section 101(b) of the Private Securities Litigation Reform Act of 1995 ("PSLRA").

3. Attached hereto as Exhibit A is the true and correct copy of the sworn Plaintiff's Certification of Robert Shemian.

4. Attached hereto as Exhibit B is a true and correct copy of the Loss Chart for Robert Shemian.

5. Attached hereto as Exhibit C is a true and correct copy of the press release published on June 13, 2011, on *Business Wire*, a well-known, national business-oriented publication, announcing the pendency of the lawsuit commenced by *Gerald Chatlin* against Defendants herein.

6. Attached hereto as Exhibit D is a true and correct copy of the firm resume of Brower Piven, A Professional Corporation.

I declare under penalty of perjury that the foregoing is true and correct. Executed
on this 12th day of August, 2011.

/s/ David A.P. Brower
David A.P. Brower